

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Timothy Louis O'Neill : Chapter 13
Debtor : No. : 19-16451-jkf

CERTIFICATE OF NO RESPONSE

The undersigned does hereby certify:

1. That I am the attorney for Timothy Louis O'Neill, Debtor in the above-captioned matter.
2. That a copy of the motion to avoid the judicial lien of Cavalry SPV I LLC at docket no. 2018-16347, along with notice of motion filed with this Court on May 7, 2020 was served upon parties in interest on May 7, 2020.
3. A Certificate of Service was filed with this Court on May 7, 2020 declaring service to the parties in interest.
4. A response deadline was set for May 27, 2020.
5. No response to said Motion has been received as of June 3, 2020.

Respectfully Submitted,

ROSS, QUINN & PLOPPERT, P.C

BY: /s/ Joseph Quinn
Joseph Quinn, Esquire
Attorney I.D. No. 307467
192 S. Hanover Street, Suite 101
Pottstown, PA 19464
T: (610) 323 - 5300
F: (610) 323 - 6081
JQuinn@rqplaw.com

Date: June 3, 2020